

### **AMENDMENTS TO THE DRAWINGS**

Figures 1 and 2 have been amended to correct two typographical errors found. The labels for items 50-53 in Figures 1 and 2, which previously indicated "RAID", have been corrected to indicate "RAM", corresponding to the written description provided, for example, at paragraphs 0018, and 0021 of the Amended Specification of the present application, and the provisional applications from which the present application depends. The label "RAPID" found between items 30 and 33 in Figures 1 and 2 has been corrected to indicate "RAID" corresponding to the written description provided, for example, at paragraphs, 0018-0019 and 0021-0023 of the Amended Specification of the present application, and the provisional applications from which the present application depends.

Replacement sheets 1/3 and 2/3 showing these changes are submitted herewith.

**REMARKS/ARGUMENTS**

Claims 25-26, 30-31, 37, 41-42, and 44-46, with Claims 25, 37, and 44-46 being independent. Claims 25-26, 31, 37, 42, and 44-46 have been amended. Support for the amendments is found in the specification, and no new matter has been added by the amendment. Applicants respectfully request reconsideration of this application in view of the amendments above and the remarks below.

**Rejection Under 35 U.S.C. 102**

The Office Action rejected claims 25, 26, 30, 31, 37, 41, 42 and 44-46 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,148,377 (Carter et al., hereinafter "Carter '377 patent"). This rejection of these claims is respectfully traversed.

Carter '377 patent describes a computer networking system which can create and manage a virtual memory space that can be shared by each computer on the network. The virtual memory can be comprised of memory devices of computers connected to the network. However, the Carter '377 patent does not disclose a distributed cache comprising a plurality of memory portions each within a memory of a computer system among a plurality of computer systems connected to the network, wherein the distributed cache is accessible to *any* computer system connected to the network independent of the computer system's location as claimed in the pending claims. While the Carter '377 patent discloses a particular type of cache, this cache is limited to a local cache used by the computer where the cache memory device is physically located. *See, e.g.*, Carter '377 patent, col. 3, ll. 23-26; col. 4, ll. 3-6; col. 10, ll. 13-17; col. 10, l. 45; col. 11, ll. 50-59; col. 12, ll. 9-17; col. 14, ll. 29-47; col. 14, ll. 36-44 (owner node can employ its local cache). Further, the Carter '377 patent does not disclose a bridge driver as recited in the pending claims.

More specifically, the Carter '377 patent does not disclose or suggest a "distributed cache memory comprising a plurality of memory portions, each within a memory of a computer system among said plurality of computer systems" "wherein said distributed cache is to be accessible to any computer system with a bridge driver connected to the network independent of the computer system's location" as recited in claim 25. Further the Carter '377 patent does not disclose "a bridge driver for communications between computer's network interface and its associated disk subsystem and memory portion," as required by claim 25. Thus, for at least these reasons, it is respectfully submitted that claim 25 and the claims that depend therefrom (claims 26, and 30-31) are allowable over the Carter '377 patent cited by the Office Action.

Similarly, the Carter '377 patent does not disclose or suggest "caching information sent to or obtained from the unified disk storage device using a distributed cache memory comprising a plurality of memory portions each within a memory of a computer system among said plurality of computer systems" and "accessing the unified disk storage device and distributed cache memory via a bridge driver, wherein said distributed cache is accessible to a computer system connected to the network independent of the computer system's location," as recited in claim 37. Thus, for at least these reasons, it is respectfully submitted that claim 37 and the claims that depend therefrom (claims 41-42) are allowable over the Carter '377 patent cited by the Office Action.

Similarly, the Carter '377 patent does not disclose or suggest a distributed cache memory that is accessible to any computer system with a bridge driver connected to the network independent of the computer system's location as claimed in claim 44. Thus, for at least these reasons, it is respectfully submitted that claim 44 is allowable over the Carter '377 patent cited by the Office Action.

Similarly, the Carter '377 patent does not disclose or suggest a "distributed system cache memory from among said portions of memory wherein said distributed system cache memory is to be accessible to any computer system with a bridge driver connected to the network independent of the computer system's location," as recited in claim 45. Thus, for at least these reasons, it is respectfully submitted that claim 45 is allowable over the Carter '377 patent cited by the Office Action.

Similarly, the Carter '377 patent does not disclose or suggest "caching information sent to or obtained from the distributed disk storage device using the distributed cache memory wherein said distributed cache memory is accessible to any computer system with a bridge driver connected to the network independent of the computer system's location," as recited in claim 46. Thus, for at least these reasons, it is respectfully submitted that claim 46 is allowable over the Carter '377 patent cited by the Office Action.

Applicant has not presented all possible arguments or may not have refuted the characterizations of either the claims or the prior art as may be found in the Office Action. However, the lack of such arguments or refutations is not intended to act as a waiver of such arguments or as concurrence with such characterizations.

**Remarks re Amendments to Specification and Figures**

The indicated above, the amendments to the Specification and Figures 1 and 2 corrected typographical errors.

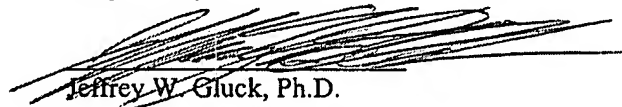
**Conclusion**

Applicant believes that the above amendments and remarks address all of the grounds for rejection and place the application in condition for allowance. Applicant, therefore, respectfully requests favorable consideration of this response and reconsideration of this application.

If the Examiner believes, for any reason, that a personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

Date: November 5, 2007

Respectfully submitted,



Jeffrey W. Gluck, Ph.D.

Registration No.: 44,457

CONNOLLY BOVE LODGE & HUTZ LLP

1875 Eye Street, NW

Suite 1100

Washington, DC 20006

Tel.: (202) 331-7111

Direct Dial: (202) 572-0322

Fax: (202) 293-6229

ANNOTATED

# REPLACEMENT SHEET 1 / 3

DISTRIBUTED RAID AND LOCATION INDEPENDENT CACHING SYSTEM

Inventor: Quing YANG; Appl. Ser. No.: 10/693,077

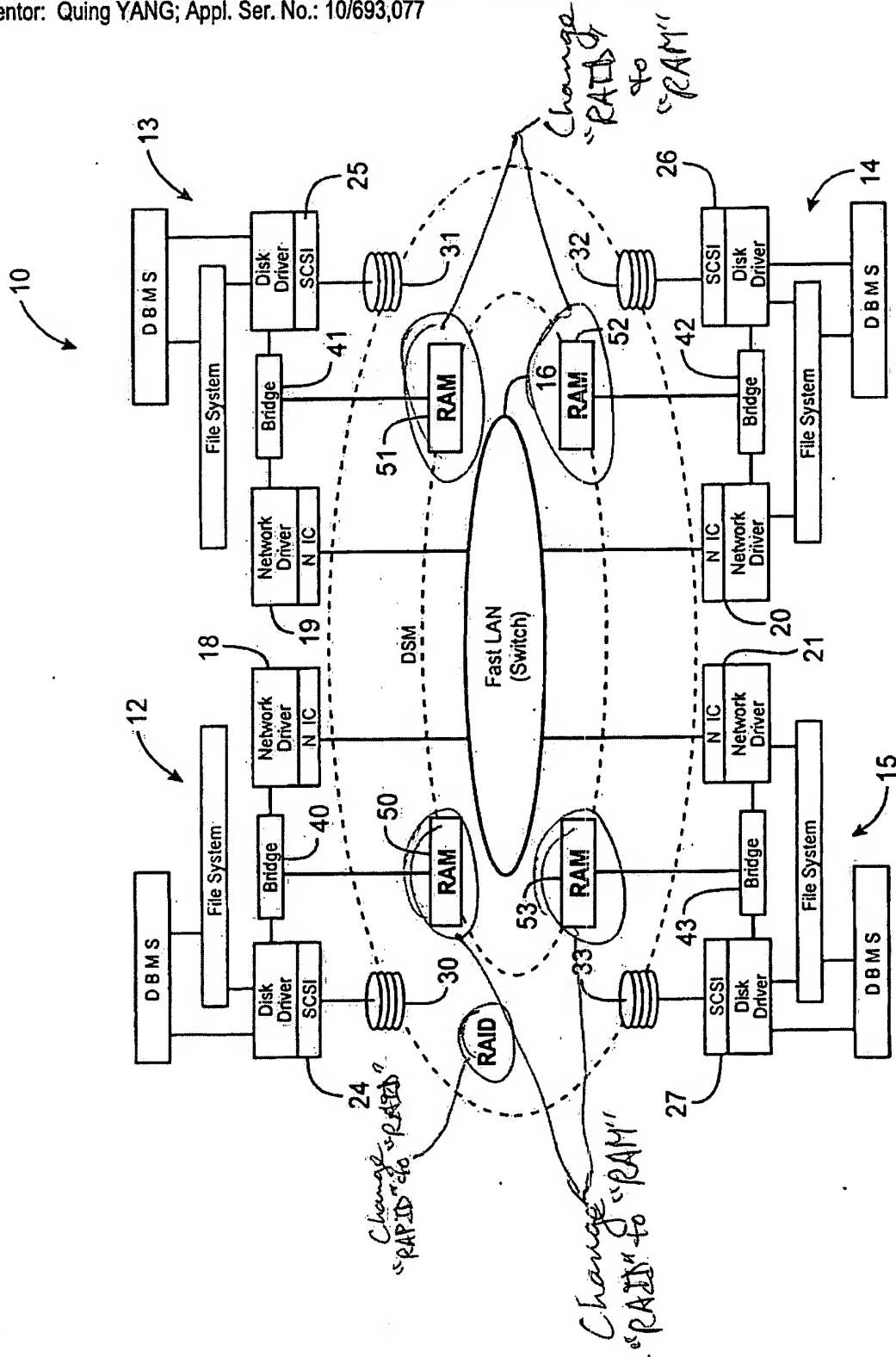


FIG. 1

ANNOTATED

~~REPLACEMENT~~ SHEET 2 / 3

DISTRIBUTED RAID AND LOCATION INDEPENDENT CACHING SYSTEM  
Inventor: Quing YANG; Appl. Ser. No.: 10/693,077

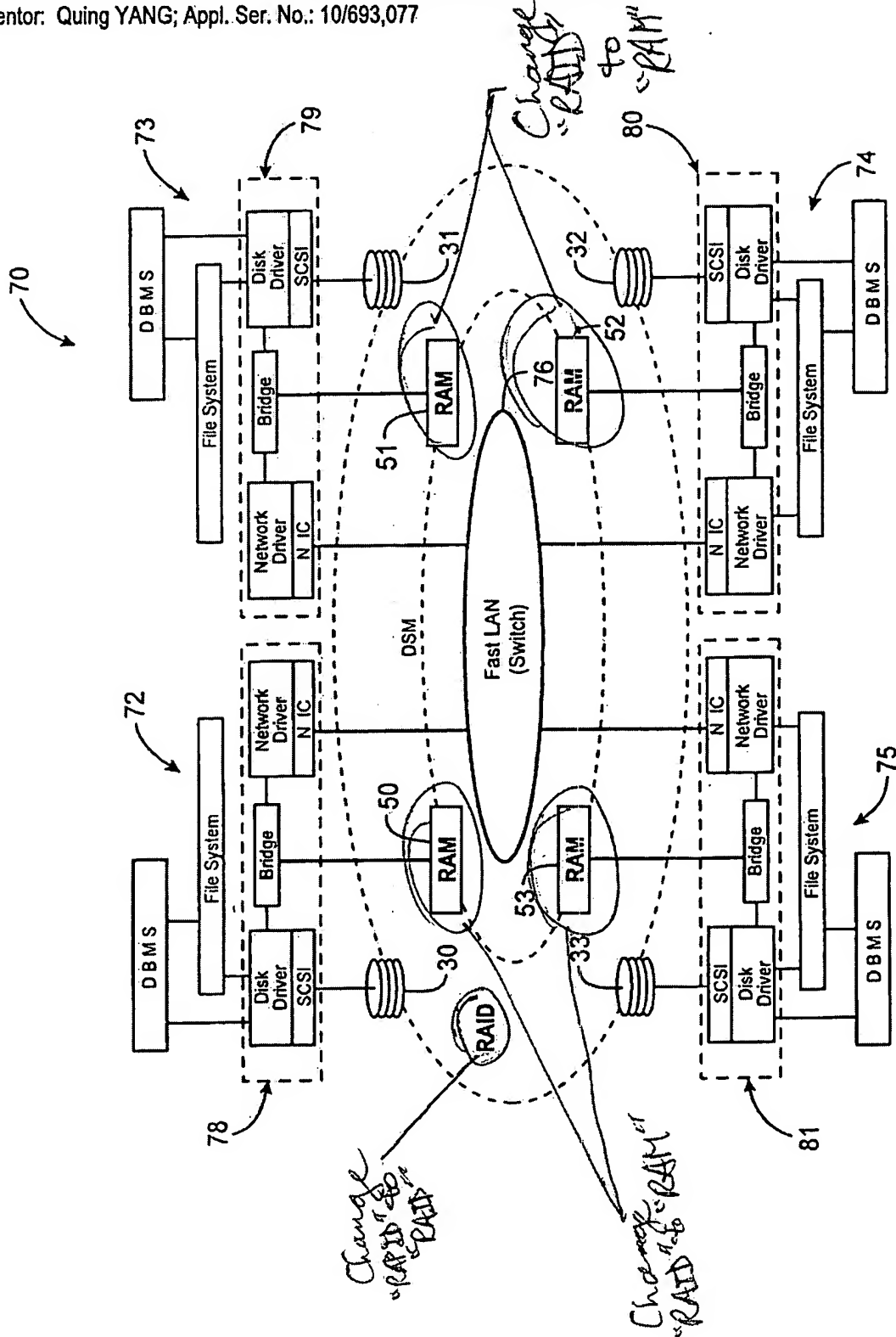


FIG. 2